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December 5, 2016

Marlene Dortch, Esq., Secretary
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

RE: Lifeline and Link-Up, WC Docket 11-42
2014 Quadrennial Review, MB Dockets 14-50, 09-182 and 07-294
Preserving the Open Internet, GN Docket 14-28
Multilingual Emergency Information, EB Dockets 04-296 and 06-119
Inmate Telephony, WC Docket 12-375
Equal Employment Opportunity, MB Docket No. 98-204
Overcoming Disadvantages Preference, GN Docket 10-244
Incentive Auction, GN Docket 12-268
Wireless Competition Report, WT Docket 13-135
Upgrading Part I competitive Bidding Rules, WT Docket 14-170

Dear Ms. Dortch:

This letter reports on a meeting held on December 5, 2016 with Brendan Carr, Esq., Legal Advisor, Wireless, Public Safety, and International for Commissioner Ajit Pai, to discuss the attached “Twelve Imperatives to Close the Digital Divide and Advance Multicultural Media and Telecom Ownership and Procurement in the First 100 Days of the New Administration” (“Twelve Imperatives Memorandum”). Representing MMTC were David Honig, President Emeritus and Senior Advisor, and myself. In addition to the points made in the Twelve Imperatives Memorandum, we made the following additional points:

- Inmate Telephony (Imperative #7): We recognize that this issue implicates the FCC’s policy on federal/state relations. In civil rights enforcement, federal supremacy has often been the only way to ensure that all citizens enjoy equal opportunity; *see Cooper v. Aaron*, 358 U.S. 1 (1958). Federal authority will also prove critical in ensuring the speedy and efficient rollout of 5G in the face of shortsighted delaying tactics by some local officials. Application of comparable federalism analysis to inmate telephony has promise as a useful way to reach consensus on this critical issue.

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- AM Radio (Imperative #12) is critical to minority broadcast entrepreneurship. Someday, inevitably, despite our best efforts to save it, AM radio is going to become economically untenable. Initially, we would like the Commissioner to convene a panel of engineers and AM operations experts to determine whether there are any prime potential uses for AM spectrum such that AM licensees could be compensated fairly for their spectrum rather than simply abandoned and left to suffer after years of loyal service to the public. The time is right to begin to find productive ways to transition from AM while giving the FCC the time to find the best solution in the public interest and allowing AM owners the opportunity to continue to participate in the industry.

Sincerely,

Kim Keenan

Kim Keenan
President and CEO

Attachment

cc: Brendan Carr, Esq.